

LIST OF EXHIBITS AND WITNESSES

[illegible]

1 LAW OFFICES OF DALE K. GALIPO
 Dale K. Galipo, Esq. (Bar No. 144074)
 2 dalekgalipo@yahoo.com
 21800 Burbank Boulevard, Suite 310
 3 Woodland Hills, California 91367
 Telephone: (818) 347-3333
 4 Facsimile: (818) 347-4118

5 William L. Schmidt, Esq. (Bar No. 206870)
 bschmidt@ncinternet.net
 6 377 W. Fallbrook, Suite 207
 Fresno, California 93711
 7 Telephone: (559) 261-2222
 Facsimile: (559) 436-8163
 8

9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA

12 ROBERT CONTRERAS,

13 Plaintiff,

14 vs.

15 CITY OF LOS ANGELES; JULIO
 BENAVIDES; MARIO FLORES; and
 16 DOES 1-10, inclusive,

17 Defendants.

Case No. CV11-01480 SVW (SH)

The Honorable Stephen V. Wilson

JOINT EXHIBIT LIST

Trial Date: September 18, 2012

19 **TO THIS HONORABLE COURT:**

20 Pursuant to the Local Rules of the United States District Court, Central
 21 District, Rule 9.7, the parties submit a Joint Exhibit List as follows:

EXHIBITS			
No.	Description	Date Identified	Date Admitted
PLAINTIFF'S EXHIBITS			
1	[ID ONLY] Consultation Record from California Hospital Medical Center dated 9/04/05 by Samuel Biggers, M.D.		

EXHIBITS			
No.	Description	Date Identified	Date Admitted
2	Diagram dated of injuries dated 09/03	SEP 19 2012	
3	[ID ONLY] California Hospital Medical Center Emergency Department Physician Record		
4	[ID ONLY] Plaintiff's medical records from California Hospital Medical Center		
5	[ID ONLY] Discharge Summary and Accompanying Documents from California Hospital Medical Center		
6	[ID ONLY] Plaintiff's medical records from Rancho Los Amigos		
7	[ID ONLY] Rule 26 Report of H. Ronald Fisk, M.D. – Original and Supplemental/Addendum		
8	[ID ONLY] Rule 26 Report of Marianne Inouye – Original and Supplemental/Addendum	SEP 19 2012	
9	[ID ONLY] Rule 26 Report of Elizabeth Holakiewicz – Original and ^{pgs 7-10} ₁₃₋₂₄ Supplemental/Addendum	SEP 19 2012	SEP 19 2012
10	Demonstrative Evidence For Plaintiff's Experts: Medical Equipment, Anatomical Models and Photographs of Medical Equipment	SEP 19 2012	SEP 19 2012
11	Family Photographs; Photographs of Plaintiff before shooting ₃	SEP 20 2012	SEP 20 2012
12	Photographs of Plaintiff's scars _{4, 5, 12, 13}	SEP 20 2012	SEP 20 2012
13	RPM Nighthawk Preliminary Report dated 9/3/2005		

EXHIBITS			
No.	Description	Date Identified	Date Admitted
14	X-Rays of Plaintiff's injuries 1,2,3	SEP 19 2012	SEP 19 2012
15	[ID ONLY] Rule 26 Report of Dr. Suzy Kim – Original and Supplemental/Addendum 6/16	SEP 20 2012	SEP 20 2012
16	[ID ONLY] Rule 26 Report of Barbara Greenfield – Original and Supplemental/Addendum 6/3-87	SEP 20 2012	SEP 20 2012
17	[ID ONLY] Rule 26 Report of Jenny McNulty – Original and Supplemental/Addendum	SEP 19 2012	
18	Charts from Elizabeth Holakiewicz reports	SEP 19 2012	SEP 19 2012
19	Charts from Marianne Inouye reports		
20	Charts from H. Ronald Fisk, M.D. reports		
21	Charts from Jennie McNulty reports		
	EXHIBITS 22-200 RESERVED FOR PLAINTIFF		
DEFENDANTS' EXHIBITS			
314	Medical Records Calif. Dept of Corrections (same as in first phase)		
315	Medical records from Rancho Los Amigos (same as in first phase, records received as of 11/30/11)		
400	Report and addendum from Dr. Suzy Kim		
401	Report and addendum from Barbara Greenfield		
402	Report and addendum from Jennie McNulty	SEP 20 2012	SEP 20 2012
403	Booking photo of Plaintiff dated 11/22/2002		
404	Report of Kris Mohandie		

EXHIBITS			
No.	Description	Date Identified	Date Admitted
405	Police Report Montebello PD date April 5, 1999		
406	Medical Records received from Rancho Los Amigos (Received July and August 2012)		
407	Omitted		
408	Transcript and CD of Plaintiff's recorded statement dated		
409	SCI information provided by Dr. Fisk		
410	Booking photo of Plaintiff date 2/23/2001		
411	Toxicology results from California Hospital Medical Center		
412	Rap Sheet of Plaintiff		

Plaintiff hereby reserves the right to amend, add to, or delete any of the above-listed information should it become necessary and/or for impeachment.

DATED: September 12, 2012 LAW OFFICES OF DALE K. GALIPO

By /s/ Dale K. Galipo
Dale K. Galipo
Attorneys for Plaintiff

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1 LAW OFFICES OF DALE K. GALIPO
2 Dale K. Galipo, Esq. (Bar No. 144074)
3 dalekgalipo@yahoo.com
4 21800 Burbank Boulevard, Suite 310
5 Woodland Hills, California 91367
6 Telephone: (818) 347-3333
7 Facsimile: (818) 347-4118

8 William L. Schmidt, Esq. (Bar No. 206870)
9 bschmidt@ncinternet.net
10 377 W. Fallbrook, Suite 207
11 Fresno, California 93711
12 Telephone: (559) 261-2222
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20 CITY OF LOS ANGELES; JULIO
21 BENAVIDES; MARIO FLORES; and
22 DOES 1-10, inclusive,

23 Defendants.

Case No. CV11-01480 SVW (SH)

The Honorable Stephen V. Wilson

PLAINTIFF'S WITNESS LIST

Trial Date: September 18, 2012

24 Pursuant to Local Rule 16-5, Plaintiff respectfully submits the following list
25 of witnesses who may be called at trial:

Witnesses:

- 26 1. Robert Contreras * SEP 20 2012
- 27 2. Irma Payan*
- 28 3. Marisol Torres*
4. Myra Contreras* SEP 20 2012
5. T.V. (minor)*
6. I.R. (minor)*

PLAINTIFF'S PROPOSED WITNESS LIST

7. Marianne Inouye (retained expert – economist) **SEP 19 2012, SEP 20 2012**
8. Elizabeth Holakiewicz (retained expert – life care planner) **SEP 19 2012**
9. H. Ronald Fisk, M.D. (retained expert –physician) ~~SEP 19 2012~~ **SEP 19 2012**
10. Jin K. Park, M.D.*
11. Samuel Biggers, M.D.*
12. David Allan Duarte, M.D.*
13. Charles Klieman, M.D.*
14. Min-Ning Huang, M.D.*
15. Ramzi Ben Youssef, M.D.*
16. Barbara Greenfield* **SEP 20 2012**

DATED: 9/13/2012

LAW OFFICES OF DALE K. GALIPO

By /s/ Dale K. Galipo

DALE K. GALIPO

Attorneys for Plaintiff

1 **CARMEN A. TRUTANICH**, City Attorney (SBN 86629x)
2 **GARY G. GEUSS**, Chief Assistant City Attorney
3 **CORY M. BRENT**, Assistant City Attorney
4 **CRAIG J. MILLER**, Deputy City Attorney (SBN 138302)
5 200 North Main Street
6 City Hall East, 6th Floor
7 Los Angeles, CA 90012
8 Telephone No.: (213) 978-8722
9 Facsimile No.: (213) 978-8785
10 Email: craig.miller@lacity.org

11 *Attorneys for Defendants* JULIO BENAVIDES, and MARIO FLORES

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 ROBERT CONTRERAS,

15 Plaintiff,

16 vs.

17 CITY OF LOS ANGELES; JULIO
18 BENAVIDES; MARIO FLORES; and
19 DOES 1 - 10, Inclusive,

20 Defendants.

21 **Case No. CV11-01480 SVW (SHx)**
22 *Hon. Stephen V. Wilson; Crtm 6*

23 **DEFENDANTS' PRELIMINARY**
24 **PROPOSED LIST OF WITNESSES**
25 **FOR PHASE 2 OF TRIAL**

26 **PRE-TRIAL CONFERENCE**
27 **AUGUST 27, 2012**

28 **TRIAL: SEPTEMBER 18, 2012**

29
30 TO THIS HONORABLE COURT AND PLAINTIFF AND HIS ATTORNEYS OF
31 RECORD:

32 COME NOW Defendants, MARIO FLORES AND JULIO BENAVIDES with their
33 list of witnesses for trial for Phase 2 of trial. Defendants reserve their rights to call other
34 witnesses for the purposes of impeachment or rebuttal.

35 Defendants may need to revise this witness list based upon the court's rulings
36 concerning motions in limine.

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WITNESSES:

LAPD Detective Julio Benavides –involved officer in seizure of Robert Contreras

LAPD Officer Mario Flores– involved officer in seizure of Robert Contreras

Robert Contreras – Plaintiff

Edward De La Cruz – crime partner of Contreras, involved in crime of drive by shooting, was in car with Contreras on Sept. 3, 2005. Address, believed to be in California State Prison. Percipient witness to Plaintiff's life prior to September 3, 2005.

Det Kerry Young, 30612 – took statement of Contreras

Det. Brien Pogue, 30523 – took statement of Contreras

Experts:

Kris Mohandie, Ph.D.– psychologist

Dr. Suzy Kim – Specialist in Spinal Cord Injury ~~9-20~~ 9-20

Barbara Greenfield – RN life care planning

Jennie McNulty – Economist SEP 20 2012

Any medical professionals from Rancho Los Amigos as needed to explain Plaintiff's condition or history, likely only arises for impeachment.

Persons from Rancho Records

April Burrell

Maricela Zambrana

Vinod Dhawan MD

Charlotte Sykora, Phd.

Min-Ning Huang MD or Jacqueline Xavier PA-C

Irene Gilgoff and Melanie Sarno

Olivia Hernandez

Valerie Burrells

Robert Dela Cruz

Ruth Hearvey

Joseph Escudero

Baudelia Martinez

Elvia Pena

DATED: September 7, 2012 Respectfully submitted,

CARMEN A. TRUTANICH, City Attorney
GARY GEUSS, Chief Assistant City Attorney
CORY M. BRENT, Assistant City Attorney

By /S/
CRAIG J. MILLER, Deputy City Attorney
Attorneys for Defendants JULIO BENAVIDES AND
MARIO FLORES